

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SANDRA HOLDING LTD.

Petitioner,

vs.

FAWZI MUSAED AL SALEH, AHMED FAWZI
AL SALEH, QUABBIN CAPITAL, INC., AND
JOHN I. SNOW III,

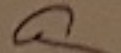
Respondents.

Case No.: 18-MC-91406 (PBS)

DECLARATION OF AHMED FAWZI AL SALEH

I, Ahmed Fawzi Al Saleh, in support of Respondents' Opposition to Sandra Holding's Application for Leave To Conduct Discovery Pursuant to 28 U.S.C. § 1782, declare as follows:

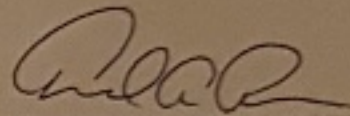
1. I have personal knowledge of the facts stated herein and, if called to testify as a witness, would testify consistence with the facts stated herein.
2. I have reviewed Sandra Holding's petition and assertions of purported wrongdoing. I understand that the merits of any possible dispute between Sandra Holding and Universal Enterprises Limited ("Universal") or my father, Fawzi Musaед Al Saleh, are not relevant to the issues that are before the Court. I will therefore not comment on Sandra Holding's assertions except to say that I have no knowledge of any wrongdoing at Universal and specifically deny being involved in any improper transaction with or for Universal.
3. I am a citizen and resident of Kuwait. I have no citizenship, and do not reside, in any state in the United States, including Massachusetts.



4. The last time I was in Massachusetts was early September 2018. Contrary to Sandra Holdings's assertions, I was not with my father, Fawzi Musaed Al Saleh, when he was served with this petition on September 28, 2018. I was not in the United States on that date. To this day, I have not been served with anything in this matter. I learned of it second hand from others.

5. I have never held a position with Universal.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Ahmed Fawzi Al Saleh

Executed on October 11, 2018